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21 Attorneys for Defendants

22 **UNITED STATES DISTRICT COURT**
 23 **NORTHERN DISTRICT OF CALIFORNIA**

24 JUAN M. REYES, SALVATORE
 25 TAGLIARENI, ANGEL DE LA CRUZ,
 26 ANTONIO MEROLLA, SMAIL MUSOVIC,
 27 TESHAYE GHEBREMEDHIN, PHILIP
 28 ROGERS, ALMOND REID, CARMELO
 CALABRO, RUSSELL NEUBERT, and
 JOHN WILLIAMS, individually and as
 representatives on behalf of a class of similarly
 situated persons,

Plaintiffs,

v.

BAKERY AND CONFECTIONERY UNION
 AND INDUSTRY INTERNATIONAL
 PENSION FUND; and STEVEN BERTELLI,
 DAVID B. DURKEE, JETHRO A. HEAD,
 ART MONTMINY, ROBERT OAKLEY,
 JAMES RIVERS, RANDY D. ROARK,
 BARBARA BRASIER, TRAVIS CLEMENS,
 JON MCPHERSON, LOU MINELLA, DOUG
 RUYGROK, and JOHN WAGNER, in their
 official capacities as Trustees,

Defendants.

Case No. 3:14-cv-5596 (JST)

**JOINT STIPULATION TO STAY ALL
 PRETRIAL AND TRIAL DEADLINES
 PENDING DISPOSITION OF THE
 PROPOSED SETTLEMENT**

The Honorable Jon S. Tigar

1 **JOINT STIPULATION**

2 The parties have reached agreement on a stipulation of settlement which they have filed
3 with the Court, and Plaintiffs have filed a motion for preliminary approval of that agreement.
4 Pursuant to Local Rule 6-2(a), Plaintiffs and Defendants hereby stipulate and request the Court to
5 enter an order staying all of the other deadlines it set in its Order [Dkt. No. 101], pending further
6 order by the Court at the conclusion of the settlement approval process. Such a stay will allow
7 the parties to focus their efforts on the settlement approval process, and it will help effectuate a
8 central purpose of the settlement agreement: namely, avoiding the costs of litigation.

9 Consistent with the local rules, previous time modifications in this case are set forth in the
10 accompanying declaration as is a description of the effect of the requested time modification.

11 WHEREFORE, Plaintiffs and Defendants jointly request that the Court grant their request
12 for a stay of the deadlines set forth in the chart in the Court’s Order [Dkt. No. 101], pending
13 further order by the Court at the conclusion of the settlement approval process.


14 Dated: October 26, 2016

ABBEY SPANIER LLP
FRUMKIN & HUNTER LLP
LAW OFFICE OF GEOFFREY V. WHITE
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17 By: /s/ Judith L. Spanier (with permission)
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GEOFFREY V. WHITE
Attorneys for Plaintiffs

22 Dated: October 26, 2016

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[PROPOSED] ORDER

The parties' Joint Stipulation to Stay All Pretrial and Trial Deadlines Pending Disposition of the Proposed Settlement is GRANTED. The deadlines set forth in the Court's Order [Dkt. No. 101] are STAYED pending further order by the Court. The Court will set the deadlines for the settlement approval process in a separate order, after reviewing Plaintiffs' motion for preliminary approval of the settlement agreement.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: October 26, 2016, 2016



THE HONORABLE JON S. TIGAR